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ATTORNEYS FOR DIANE G. REED,  
CHAPTER 7 TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

In re:	§	
	§	
JEROME ALBERT GRISAFFI,	§	CASE NO. 19-33855-SGJ-7
	§	(Chapter 7)
	§	<b>Hearing Date: September 28, 2022</b>
Debtor.	§	<b>Hearing Time: 9:30 a.m.</b>

**TRUSTEE'S WITNESS AND EXHIBIT LIST FOR HEARING  
ON TRUSTEE'S MOTION TO AMEND ORDER GRANTING  
TRUSTEE'S MOTION TO APPROVE SALE OF STOCK**

TO THE HONORABLE STACEY G.C. JERNIGAN, UNITED STATES BANKRUPTCY JUDGE:

Diane G. Reed (the "Trustee"), the Chapter 7 trustee of the estate of Jerome Albert Grisaffi (the "Debtor"), files this Witness and Exhibit List for the September 28, 2022 hearing on her Motion to Amend Order Granting Trustee's Motion to Approve Sale of Stock (the "Motion to Amend;" Docket No. 149), and respectfully designates the following potential witnesses and exhibits:

**Witnesses**

1. Diane G. Reed.
2. David W. Elmquist.
3. Any witness identified or called by any other party.
4. Any rebuttal or impeachment witness.

**Exhibits**

**Tab    Description**

1. Trustee's Motion to Approve Sale of Stock, filed May 9, 2022 (Docket No. 143).
2. Order Granting Trustee's Motion to Approve Sale of Stock, entered June 16, 2022 (Docket No. 146).
3. Claims Register.
4. Claim No. 4 of the Internal Revenue Service, filed December 23, 2019.
5. MDM Permian, Inc. Amended Financial Statements as of June 30, 2022.
6. MDM Permian, Inc. Disclosure Statement Pursuant to the Pink Basic Disclosure Guidelines for the period ending June 30, 2022.
7. MDMP Interactive Stock Chart – Yahoo Finance, September 21, 2020-September 21, 2021.
8. MDMP Interactive Stock Chart – Yahoo Finance, September 21, 2021-September 21, 2022.
9. Any exhibit identified or offered by any other party.
10. Any rebuttal or impeachment exhibit.

Additionally, the Trustee expressly reserves the right to amend and add additional witnesses and exhibits, as they are determined to be relevant or helpful by the Trustee or the Court. Moreover, the Trustee reserves the right to use any pleadings or other documents filed in the bankruptcy case and to move the Court for additional relief, if necessary.

Dated: September 23, 2022.

Respectfully submitted,

/s/ David W. Elmquist

David W. Elmquist (SBT No. 06591300)

**REED & ELMQUIST, P.C.**

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**ATTORNEYS FOR DIANE G. REED,  
CHAPTER 7 TRUSTEE**

**CERTIFICATE OF SERVICE**

This is to certify that on September 23, 2022, the undersigned caused a true and correct copy of the foregoing Witness and Exhibit List to be served electronically on all registered ECF users in this case, including counsel to the Debtor.

/s/ David W. Elmquist

David W. Elmquist